



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

CERTIFIED MAIL #Z 161 434 060
RETURN RECEIPT REQUESTED

AUG 18 1995

Mr Paul M. Parchinski
Process Superintendent
CITGO Asphalt Refining Company
4 Paradise Road
P.O. Box 249
Paulsboro, NJ 08066

Dear Mr. Parchinski:

This letter references a Spill Prevention Control and Countermeasure (SPCC) Field Inspection performed on July 25, 1995, at CITGO Asphalt Refining Company, Paulsboro, New Jersey. A copy of the SPCC Field Inspection form that was given to you at the time of the inspection outlines apparent violations of 40 CFR Part 112 of the U.S. Environmental Protection Agency (EPA) regulations pertaining to the prevention of oil spills from reaching waters of the United States. The following are the specific deficiencies noted at the time of the inspection:

SPCC Plan Deficiencies

SPCC Plan does not follow the sequence of 40 CFR 112.7.
[40 CFR 112.7]

SPCC Plan does not address that buried pipelines are wrapped/coated to reduce corrosion. [40 CFR 112.7(e)(3)(i)]

SPCC Plan does not adequately address that the tank truck and tank railcar loading/unloading procedures meet the minimum requirements of the Department of Transportation as well as EPA requirements. [40 CFR 112.7(e)(4)]

SPCC Plan does not indicate an interlocked warning light or physical barrier system or warning signs should be provided to prevent vehicular departure before disconnect of the transfer lines. [40 CFR Part 112.7(e)(4)(iii)]

FIELD Deficiencies

"Pak-Tank" diesel tanks lack secondary containment due to non-valved (open) drain pipe. [40 CFR 112.7(e)(c)(i)]

Drain valves on secondary containment are not sealed closed.
[40 CFR 112.7(e)(2)(iii)]

Throughout the facility, such as the process area (refining area), railcar loadout areas, etc., leaks have not been promptly corrected or cleaned-up. [40- CFR 112.7(e)(2)(x)]

Oil containing 55 gallon drums found throughout the facility lack secondary containment. [40 CFR 112.7(e)(2)]

Secondary Containment Systems

- type of construction-tank farm area has earthen floor and berm, other areas are of reinforced concrete constructed floor and walls.
- condition of the secondary containment-appears to be adequate and maintained.
- sufficiently impervious and sufficient volume- All secondary containment appears to be sufficiently impervious, drain piping penetrates dike walls and has no valve (in the "Pak-Tank" area), the secondary containment system appears to have sufficient capacity for the largest tank including the 10% allowance for rainwater.

I trust you will take prompt, responsible action to eliminate any violation of 40 CFR Part 112 by providing this office with a schedule for implementation of the necessary changes or additions. On the date of the inspection, you were notified of your responsibilities to submit a schedule for implementation within 60 days. Please be advised that owners or operators of facilities in violation of 40 CFR Part 112 are subject to civil penalty assessments of \$25,000.00 per day of violation.

If there are any questions concerning the SPCC Field Inspection form, please contact my office at (908) 906-6918.

Sincerely yours,



Michael F. Solecki, On-Scene Coordinator
Oil Program Section
Response and Prevention Branch

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